

17-mile RI & Modeling Comments for Discussion
EPA Region 2 -CPG Teleconference
May 16, 2016

RI Comments

- Extent of analyses needed to characterize nature and extent of subsurface contamination. (comment 110)
- Discuss all COPCs in nature and extent (comment 109)
- Compare sediment contaminant concentrations to NJ ecological screening levels (comment 109) and water column concentrations to New Jersey Surface Water Quality Standards and/or Federal Ambient Water Quality Criteria (comments 185 and 218)
- Discuss tributaries' physical characteristics, contaminant nature and extent, contaminant fate and transport, and potential for natural recovery (comment 139), as well as the influence of the LPR on the tributaries (comment 192)
- Use SSS data to describe anticipated debris/obstructions and utility crossings to inform evaluation of remedial alternatives in the FS (comment 57)
- Protect carp (comments 154, 174, 176, 178, 179, 181, 240, 242, 257, 260, 264, 266, 271, 311)
- Replace "typically" and "generally" with quantitative results (comment 21)

Modeling Comments

- Calibrate 29 COPCs in CFT model (comment 372)
- A number of the modeling comments engender requirements that would be difficult to implement and would have either have little impact on model performance or add complexity without clear benefit to the model predictions. In some cases, these would require model development beyond what has been accomplished in the field of contaminant fate modeling (i.e., beyond the state of the art). (comments 381, 405, 540, 545, 558, and 3.d in Attachment 3)